

REMARKS/ARGUMENTS

Prior to entry of this amendment, claims 1-29 were pending in the application. No claims have been added, amended, or canceled. Hence, after entry of this amendment, claims 1-29 will stand pending in the application.

PRELIMINARY MATTERS

Claims 1-25 were previously amended in the Preliminary Amendment filed along with the RCE on November 19th, 2003. At the same time, claims 26-29 were added. The amended claims coincided with amendments to the claims which were made in the Response to the Final Office Action filed on October 30th, 2003, but which were not entered by the Examiner. As discussed with the Examiner on March 9th, 2004, it appears that the amendments to the claims were entered, but new claims 26-29 were missed. Applicant respectfully requests the Examiner verify the amendments to claims 1-25 were entered as it appears to Applicant that the response mailed on December 11, 2003 may have addressed the claims as they stood before the Preliminary Amendment. Applicant also respectfully requests that claims 26-29 added in the Preliminary Amendment be entered (if necessary) and considered by the Examiner. For the Examiner's convenience, a copy of the previously filed Preliminary Amendment is being enclosed with this Response.

CLAIM REJECTIONS

All pending claims have been rejected under § 103 as unpatentable over the combination of Sonti and Sanchez. Applicant respectfully traverses the rejections.

Claim 1 recites "in response to the request and without prompting by any Switching Center, sending the profile update to the Switching Center." As previously argued by the Applicant and as acknowledged by the Examiner, Sonti does not teach or suggest these recitations of claim 1. The Office action states that these recitations are taught by Sanchez. See Office Action of December 11, 2003, p. 3, ¶ 1. Applicant respectfully disagrees.

Sanchez discloses an apparatus for changing a subscriber's features profile. Sanchez, col. 2, ll. 34-35. The changes may be made by an Assigned Mobile Station (AMS)

(i.e., the subscriber's mobile phone) or a Non-assigned Mobile Station (NMS). Id. at col. 4, ll. 24-28. Either the AMS or the NMS may make feature changes through a combination node 65, 75, which includes a Mobile Switching Center (MSC). Id. at col. 4, ll. 32-33, 42-43. After the changes have been made by the subscriber, a Feature Request (FEATREQ) is sent to the Home Location Register (HLR) and in response to the request received from the Mobile Switching Center the HLR updates the subscriber feature and sends a Qualification Directive (QUALDIR) to the MSC to update the subscriber class. Id. at col. 4, ll. 52-62. Thus, in contrast to claim 1, the changes are not made without prompting by any Switching Center, as the QUALDIR is sent in response to the FEATREQ prompt sent by the MSC.

Alternately, if the subscriber is roaming outside of the HLR area or wants to make changes through a PSTN, a pilot node 100 can be used to update the HLR with a FEATREQ. Id. at col. 5, ll. 37-59, col. 6, ll. 23-25. Applicants respectfully disagree with the Office Action that the recitations of claim 1 are disclosed by the method illustrated in steps 200-310. Office Action, p. 3, ¶ 1. The method illustrated in steps 200-310 is described in reference to subscriber updates which are made by nodes including an MSC. Sanchez, at col. 7, ll. 24-44. The pilot node does not include an MSC. Id. at col. 5, ll. 26-28. In the embodiment in which a FEATREQ is sent by the pilot node, Sanchez only discloses that the HLR feature profile is updated, a result message is sent to the pilot node, and a confirmation message is sent from the pilot node to the subscriber. Id. at col. 8, ll. 50-55. At no point in the embodiment using the pilot node does the HLR update a MSC.

As none of the references teach or suggest the recitations of claim 1 discussed above, Applicant respectfully submits claim 1 is allowable. Claims 5, 6, 23, 26, and 29 contain recitations similar to those discussed above with reference to claim 1 and are believed to be allowable for at least the same reasons. The remaining claims depend directly or indirectly on one of claims 1, 5, 6, 23, 26, and 29 and are accordingly believed to be allowable for at least the same reasons, as well as for the additional recitations which they set forth.

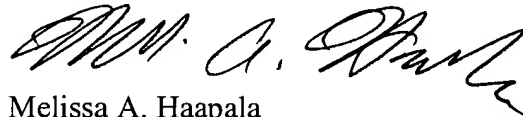
INVITATION FOR A TELEPHONE INTERVIEW

Applicant earnestly requests the Examiner call the undersigned at 303-571-4000 if there are any issues of allowance remaining with this application.

CONCLUSION

In view of the foregoing, the applicants believes all claims now pending in this application are in condition for allowance and respectfully requests an action to that end.

Respectfully submitted,



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Attachments

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